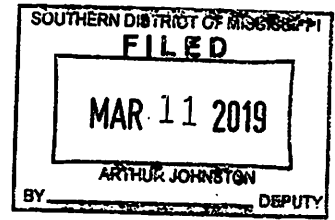


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



ANGELA WARD on the behalf of

PLAINTIFF

GEORGIA ELLEN HEAD

V.

CIVIL ACTION NO. 3:18CV779 CWR-LRA &

CIVIL ACTION NO. 3:18CV831

HARRISON COUNTY HINDS COUNTY

WHITFIELD STATE HOSPITAL.

DEFENDANTS

AMENDED COMPLAINT
Motion to Appoint Conservator

1) All parties involved or not listed. Please add all parties and entities

- 1) Ralph Price - 1st Conservator
- 2) Judge Persons
- 3) Patrick Sheehan My Attorney
- 4) JD Lee Mother's Attorney
- 5) Yvette Stelly 1st Guardian At Litem
- 6) Vonder Bruegge Bryan J - Guardian At Litem/2nd Conservator
- 7) SOUTH MISSISSIPPI STATE HOSPITAL
- 8) PINE GROVE STATE HOSPITAL
- 9) EAST MISSISSIPPI STATE HOSPITAL
- 10) RULEVILLE NURSING HOME AND REHABILITATION CENTER
- 11) MERIT HEALTH OF JACKSON MISSISSIPPI
- 12) GULF OAKS PSYCHIATRIC ASSOCIATES
- 13) SUNFLOWER CHANCERY COURT MS
- 14) RULEVILLE POLICE DEPARTMENT

2) REQUESTING CRIMINAL CHARGES BE BROUGHT UPON ALL PARTIES

INVOLVED ACCORDINGLY. Georgia Head is a human being and has had all her right violated under the Vulnerable Persons Act. And the ADA. Miss using of power is a crime, falsifying documentation is a crime, Miss representation is a crime.

3) ANGELA WARD AND GEORGIA HEAD REQUESTING FOR PROPER CANCEL UNDER VICTIMS RIGHTS ACT.

4) 2013 Mississippi Code TITLE 43 - PUBLIC WELFARE

Chapter 47 - VULNERABLE PERSONS ACT

§ 43-47-37 – Reporting of abuse and exploitation of patients and resident of a precipitate

5) MENTAL AND EMOTIONAL ABUSE Georgia Head has suffered mental abuse from the staff at Ruleville nursing home and rehabilitation center. Constant harassment to patient and daughter during visitation. Threats to Georgia Head if she cries from staff members at Ruleville nursing home and rehabilitation center. Causing mental and emotional abuse upon Georgia Head. Georgia Head had been told if she cries, she would never no longer see her daughter.

6) 2010 Mississippi Code TITLE 43 - PUBLIC WELFARE

Chapter 47 - Mississippi Vulnerable Adults Act.

43-47-19- Prohibition against abuse, neglect, or exploitation; penalties; relations

to other laws **§ 43-47-19. Prohibition against abuse, neglect, or**

exploitation; penalties; relation to other laws. Georgia Head is allowed to

sign papers for others to have access to her money. Georgia Head is not

allowed to speak upon where she would like to live and be able to thrive in her community. Georgia Head had been labeled with mental issues but nothing that cannot be handled with medication to allow her to thrive outside of lockdown facilities in a normal life setting. **Georgia has physical needs are not met see pictures.**

7) 2013 Mississippi Code TITLE 41 - PUBLIC HEALTH

**Chapter 21- INDIVIDUALS WITH MENTAL ILLNESS OR AN INTELLECTUAL
DISABILITY**

PERSONS IN NEED OF MENTAL TREATMENT

§ 41-21-102 - Patients' rights

Georgia Head has been held against her will in state facilities, hospitals, and now nursing home for over a year; Just for profit of money and Medicaid fraud.

Georgia Head medication was stable December 8th 2017 via a recorded conference call with South Mississippi State Hospital Purvis Mississippi. The abuse of demeaning the mentally ill has worked its way through every single state facility in Mississippi when it comes to Georgia Head. Georgia Head is a human being not a paycheck. Georgia Head has not seen the inside of a courtroom to speak on her behalf on any of her wishes. Georgia Head does not know Ralph Price first conservative or Vonder Bruegge Bryan J second conservator. Georgia Head and Angela Ward could not pick them out of a lineup but they make decisions for where Georgia Head is placed. Georgia Head has

been lied to repeatedly for over a year about able to be Returned to be United with her daughter. Georgia Head has not seen the outside of lockdown facilities in over a year. She is being denied the right to thrive and live within her community. No communication between neither conservator with Georgia Head or with her family. They make decisions where they spend her money. In over a year Georgia Head has received less than equivalent of 1 months SSI check. The rest of the money has disappeared and it's not spent properly on Georgia Head. Georgia Head has asked repeatedly for documentation she has signed with no success. Georgia Head is illiterate she cannot read or write. Georgia Head has signed papers without a proper advocate explaining everything in full detail where she understands what was signed. Georgia Head was told if she did not sign she would go back where she came from, the state hospital byi Ruleville nursing home and rehabilitation center.

**8) Mississippi Code TITLE 43 - PUBLIC WELFARE
MENTAL ANGUISH § 43-47-5**

Georgia Head and Angela Ward have both been told, it's their fault for whatever reason made up of why they are not allowed to see each other by Ruleville nursing home and rehabilitation center. No conservator has had any communication on this issue and refuses to return calls. Avoiding communication is not in the best interest of Georgia Head. Georgia head and Angela Ward have not committed a crime to be separated from biological family.

9) VIOLATIONS OF THE AMERICAN WITH DISABILITY ACT.

Ruleville nursing home and rehabilitation center and conservators are in straight violation of the (ADA.) They have failed to communicate properly with the patient Georgia Head. Georgie Head was aloud to sign paperwork without an advocate incomplete understanding.

10) 2013 Mississippi Code TITLE 97 - CRIMES
Chapter 3 - CRIMES AGAINST THE PERSON
§ 97- 3 – 73 – ROBBERY

Georgia Head upon arrival at Ruleville nursing home and rehabilitation center was threatened. If Georgia Head did not sign paperwork that she could not read or have any comprehension at what was being signed, Georgia Head would be returned back to where she came from Whitfield Mississippi State Hospital. It's to be believed Georgia Head has signed permission for Ruleville nursing home and rehabilitation center have access to Georgia Head's SSI check. Georgia Head may or may not signed for a new conservator. Georgia Head is denied any paperwork showing what she has signed. Georgia Head has been denied the right of complete understanding of what's been signed and all court hearing held without her knowledge or presents to select people to be over all of her decisions and money.

11) 18 U.S Code § 1201 Kidnapping

Medical kidnapping is Abducting Georgia Head whom has a mental illness to hold against her will and wishes for over a year.. Medication stable December 8th of 2017 via recorded phone call with South Mississippi State Hospital.

12) 2010 Mississippi Code TITLE 97 – CRIMES
Chapter 3 – Crimes Against the Person
§ 97-3-82 – Extortion; definition; offense and penalties.

Georgia Head has felled victim to be extorted for over a year. Repeated Georgia

Head was told if you do this. Georgia Head never gets to go home. On to the next facility so they can continue to defraud the Government for money by founding, SSI checks, Medicaid. Georgia Head has also been threatened with no communication with family or visits if she talks too much about what's going on with her care or money. Georgia Head not allowed to show emotions towards missing her family member. Staff at Ruleville nursing home and rehabilitation center told Georgia Head if she cried when her daughter was leaving she would no longer be allowed to see her daughter Angela Ward.

13) TITLE 42 – The Public Health And Welfare

Chapter 21 – CIVIL RIGHTS (§§ 1981 – 2000h-6)

Subchapter I-A - INSTITUTIONALIZED PERSONS (§§ 1997 – 1997j)

Georgia Head had her civil rights violated when the state did not protect her from being institutionalized behind corruption.

14) Section 1983 (42 U.S.C. § 1983 – Civil action for deprivation of rights) & Bivens Act.

Georgia Head and Angela Ward are not allowed to report crimes that actually get investigated. Not allowed to file paperwork with court or have proper counsel.

15) 18 U.S Code § 241 Conspiracy Against Rights

Angela Ward and Georgia Head have recorded confirmation that more than three people has work together at Ruleville nursing home and rehabilitation Center to

conspire to violate Georgia Head rights. Only recorded confirmation these people are laughing and think it's funny to valley somebody's rights and hold them against their will for money. They have alienated Georgia Head away from her entire family and refused to let her use the phone. She is not allowed a visitor. Georgia Head has been told repeatedly to contact an attorney she does not know and that will not respond to any of her communication or her daughter's communication. Upon further investigation this supposed Law firm is at a house located in Long Beach Mississippi in the hood.

16) 923. 18 U.S.C. § 371 - CONSPIRACY TO DEFRAUD THE UNITED STATE

Ruleville nursing home and rehabilitation center along with State facilities using two different law firms to defraud government-funded money and Medicaid while holding somebody against their will so they can collect funds (MONEY) Using Doctors signatures to sign the deal. The facilities the doctors and the attorneys are profiting off of violating Georgia Head's rights. Via recorded conference call December 8th 2017 Georgia Head medication was stable and she was able to return home but her wishes were denied and the fraud began.

17) REQUESTING AN IMMEDIATE RELEASE AB GEORGIA HEAD

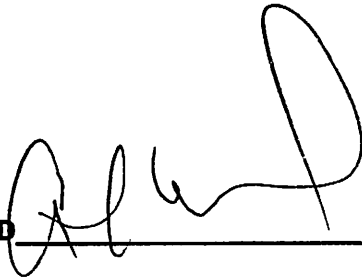
18) REQUESTING EMERGENCY HEARING IN GUARDIANSHIP- CONSERVATOR OF GEORGIA HEAD

Angela Ward and Georgia Head pray and ask the honorable Judge of this Court for relief and remedy. Georgia Head's needs and wishes to be acknowledged for her to live and thrive in a normal society. Georgia Head not to be discriminated against any longer due to her disability. Please allow Angela Ward and Georgia Head to speak in a Court. Angela Ward is the only

biological child to Georgia Head and have been alienated from each other behind corruption. Please take into consideration that the Department of Justice has open lawsuit against the state of Mississippi August 11th of 2016 for the exact same things that Georgia Head has fell victim to.

Georgia Head and Angela Ward would appreciate if the Court could reinstate the conservatorship of Georgia Head back to her daughter Angela Ward. Allow Georgia Head to return home where she can live and thrive in her community. Where she can live a normal life outside of a lockdown facility without abuse. Chief of Police Ernie Scarber of Ruleville has received multiple videos to show Georgia Heads Wishes and proof crimes have been committed against her at his email erniescarber@hotmail.com.

ANGELA WARD



Date Thursday March 11th 2019

Georgia Ellen Head

Ruleville nursing home and rehabilitation center

800 Stansel Dr, Ruleville, MS 38771

(662) 756-4361

Vonder Bruegge Bryan J. B.A.R. 100470

19004 Pineville Road.

Long Beach Mississippi 39560.

(228) 864-7443

Yvette Stelly - B.A.R. 104379

P.O. Box 1204

Gulfport, MS. 39502

Office Closed Down

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Mailing Only Angela Ward

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Biloxi, Ms. 39531

Have permanent address but in fear of retaliation prefer to leave it off of documentation

Ralph price

P.O. Box 480.

Gulfport MS, 39502.

JD LEE

P.O. Cramer CC

Gulfport MS 39502

Ruleville Police Department

200 E Floyce St,

Ruleville, MS 38771